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6 U.S. DISTRICT COURT
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8 MIDDLE DISTRICT OF PENNSYLVANIA

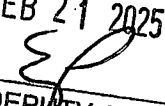
9 FRANK TUFANO ,
10
11 Plaintiff,

12 vs.

13 SHOPIFY (USA) INC.
14 LEWIS & LIN LLC
15 ALL OPERATING CORPORATIONS AND
16 LLC'S FOR SHOPIFY
17 Defendants

Case No.:

3 : CV - 25 - 0316
VERIFIED COMPLAINT

FILED
SCRANTON
FEB 21 2025
PER 
DEPUTY CLERK

- 18 1. On the 13th of February a court order was issued to Shopify regarding Frank
19 Tufano's online store "frankie-free-range-meats.myshopify.com." (EXHIBIT A)
- 20 2. The LLC stated in the court order "Frankie's Free Range Meat," is not Frank
21 Tufano's business, however the attorney Davis Lin of "Lewis & Lin LLC,"
22 fraudulently used the court order to request information from Frank Tufano's
23 online store.
- 24 3. "Frankie's Free Range Meat LLC," is a Delaware Entity that was Voluntarily Cancelled
25 on 9/8/2021 according to the Delaware Secretary of State. (EXHIBIT B)
- 26 4. Frank Tufano's online business operates under a separate LLC not in the state of
27 Delaware.

1 5. Despite Frank Tufano's efforts to communicate this to Shopify and file several
2 new lawsuits as well as motions in the relevant case, Shopify sent an email to
3 Frank Tufano on 2/21/2025 stating that they would produce the information to
4 "Lewis & Lin LLC," on February 28, 2025.
5

6 **JURISDICTION**

7 6. This Court has subject matter jurisdiction pursuant to 28 U.S.C. par. 1332
8 because there is a complete diversity of citizenship between each plaintiff and
9 Defendant and the amount in controversy exceeds \$75,000.
10
11 7. Frank Tufano's residence and domicile is in Carbondale, PA
12
13 8. Lewis & Lin LLC's residence and domicile is in Brooklyn NY
14
15 9. Shopfiy has multiple operating Corporations and LLC's in the state of New
16 York, Delaware, and California. (EXHIBIT C)

17 **FIRST CLAIM FOR RELIEF**
18 **FRAUD**

19 10. Lewis & Lin LLC fraudulently submitted a court order for the incorrect LLC
20 against Frank Tufano's operating online store.
21
22 11. Shopify is obeying the fraudulent court order, despite being made aware the LLC
23 in the court order is not the operating LLC for Frank Tufano's online store.
24

25 **EMERGENCY MOTION TO STAY**

26 12. Frank Tufano requests that all current actions in the case "Saladino, MD v.
27 Frank Tufano No. 7:2020cv09346," be stayed until a determination is made on
28

whether Frank Tufano's rights were violated and whether the rules of the court were adhered to.


PRAYER FOR RELIEF

13. WHEREFORE, by reason of the acts and circumstances alleged herein, Frank Tufano seeks relief from this Court as follows:

A. Shopify and Lewis & Lin LLC be ordered to cease any fraudulent operations against Frank Tufano's online store by using court orders issued against different entity's.

B. Frank Tufano be reimbursed for loss of revenue, trade secrets, and legal expenses brought onto him by the fraudulent conduct executed by Shopify and Lewis & Lin LLC to an amount no less than \$75,000.

Dated: Friday, February 21, 2025


By: /s/ Frank Tufano

Frank Tufano